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## United States Bankruptcy Court Eastern District of Pennsylvania

In re:

Case No. 23-12591-pmm

Toni Murphy, Arthur Murphy,

Chapter 13

Debtors.

Related to ECF No. 30

## Debtors' Objection to Motion for Relief from Stay filed by Lakeview Loan Servicing, LLC

AND NOW, Debtors Toni Murphy and Arthur Murphy, by and through their attorney, hereby objects to the Motion for Relief from Stay filed by Lakeview Loan Servicing, LLC. Because the purported arrearage that gave rise to the Motion can be timely paid directly or through the chapter 13 plan, no grounds for relief exist and the Motion must be denied.

**NOW, THEREFORE**, the Debtors ask this Court to deny the Motion in the form of order attached and to grant such other and further relief in their favor as may be necessary and proper under the law.

Date: November 29, 2023 CIBIK LAW, P.C. Counsel for Debtors

By: /y/ Michael A. Cibik
Michael A. Cibik (#23110)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
mail@cibiklaw.com

## **Certificate of Service**

I certify that on this date I caused a true and correct copy of the Debtors' Objection to Motion for Relief from Stay filed by Lakeview Loan Servicing, LLC to be served on all parties on the clerk's service list through the CM/ECF system.

Date: November 29, 2023

/s/ Michael A. Cibik

Michael A. Cibik

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## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

In re:	Case No. 23-12591-pmm
Toni Murphy, Arthur Murphy, Debtor.	Chapter 13 Related to ECF No. 30
Order Denying Motion for Relief from Stay filed by Lakeview Loan Servicing, LLC	
<b>AND NOW</b> , upon consideration of the Motion for Relief from Stay filed by Lakeview Loan Servicing, LLC, and the Debtors' objection thereto, and after notice and hearing, it is hereby <b>ORDERED</b> that the Motion is <b>DENIED</b> .	

Patricia M. Mayer U.S. Bankruptcy Judge

Date: